

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN THE MATTER OF

ADELICIA MELENDEZ BURGOS  
Debtor

CASE NO: 16-03855 (**BKT**)

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FIRSTBANK PUERTO RICO  
Movant

**CHAPTER 7**

ADELICIA MELENDEZ BURGOS  
NOREEN WISCOVITCH RENTAS  
Respondents

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**REQUEST FOR NEW SET OF SUMMONS UNDER 11 USC 362**

TO THE HONORABLE COURT:

Comes now **FIRSTBANK PUERTO RICO** through its undersigned counsel and respectfully alleges and prays:

I. JURISDICTION.

1. That this Honorable Court has jurisdiction under 28 USC §1334 on Jurisdiction, 28 USC §1408 on Venue.

II. FACTS.

2. Debtor filed a Chapter 13 under the Bankruptcy Code on May 13, 2016. See, Bkcy Dck 1

3. Movant filed a claim to a personal lease under in the amount of \$31,740.00, under account no 6232. See, Clm. Reg. 3

4. On February 28, 2019, Movant filed a motion under title 11 USC §362 requesting the relief from the automatic stay due to arrears in the post- petition payments. See, Bkcy Dck 75.

5. As of to March 5, 2019 debtor file a response disclosing that as of to March 4, 2019 she had filed for a conversion to chapter 7 and that she consents to the lift of the automatic stay in favor of First Leasing. See, Bkcy Dck 79 and 835. In order to allow the debtor to cure the remaining arrear. Movant request a final hearing.

7. Yet, in as much a new trustee has been designated, Movant request a new set of summons to notify all Parties in interest.

WHEREFORE, **FirstBank Puerto Rico: First Leasing** respectfully requests from this Honorable Court to grant this motion.

#### **RESPONSE TIME NOTICE**

Within fourteen (14) days after service as evidenced by the certification, and additional three (3) days pursuant to Fed. R. Bankr. P. 9006 (f) if you were served by mail, any party against whom this paper has been served, or any party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's Office Bankruptcy Court for the District of Puerto Rico.

If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

**Rule 9013-1 (h)**

#### **CERTIFICATE OF SERVICE**

I hereby certify that on this same date a true and correct copy of the present motion was sent to the authorized addresses on, and by the CM/ECF system to all the creditors as listed, and the attorney for the Plaintiff (s) ROBERTO FIGUEROA CARRASQUILLO, at the address on docket; to the chapter 7, Atty. NOREEN WISCOVITCH RENTAS, at 400 CALAF ST., SAN JUAN, PUERTO RICO 00918, and to the Debtor(s) by first class mail at the address on record, ADELICIA MELENDEZ

BURGOS, at ALTOS DE LA FUENTE, E2 STREET 2, CAGUAS, PUERTO RICO 00725.

In San Juan, Puerto Rico, the 2<sup>nd</sup> of April, 2019

**BY: //s// María M. Benabe Rivera**

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